

EXHIBIT A

SHERIFF'S ENTRY OF SERVICE

Civil Action No. 2015 CV 257488

Date Filed _____

Superior Court ☐
State Court ☐
Juvenile Court ☐

Magistrate Court ☐
Probate Court ☐

Georgia, Fulton COUNTY

Attorney's Address

• CLAUDIA BLINDSPRICK
• 631 WINDY HILL
• STONE MOUNTAIN 30087

CLAUDIA BLINDSPRICK

Plaintiff

Name and Address of Party to be Served.

ALDRIDGE CONCRETE, LLC
15 PIEDMONT PLAZA
3575 PIEDMONT PARKWAY NE
Atlanta Ga 30305

VS.

ALDRIDGE CONCRETE, LLC
Bank of America N.A. Meridian Bank

Defendant

Garnishee

SHERIFF'S ENTRY OF SERVICE

PERSONAL

☐ I have this day served the defendant _____ personally with a copy of the within action and summons.

NOTORIOUS

☐ I have this day served the defendant _____ by leaving a copy of the action and summons at his most notorious place of abode in this County.

☐ Delivered same into hands of _____ described as follows:
age, about _____ years; weight _____ pounds; height, about _____ feet and _____ inches, domiciled at the residence of defendant.

CORPORATION

☒ Served the defendant Aldridge Concrete, LLC a corporation
☒ by leaving a copy of the within action and summons with Y T Bailey
in charge of the office and place of doing business of said Corporation in the County.

TACK & MAIL

☐ I have this day served the above styled affidavit and summons on the defendant(s) by posting a copy of the same to the door of the premises designated in said affidavit, and on the same day of such posting by depositing a true copy of same in the United States Mail, First Class in an envelope properly addressed to the defendant(s) at the address shown in said summons, with adequate postage affixed thereon containing notice to the defendant(s) to answer said summons at the place stated in the summons.

NON EST

☐ Diligent search made and defendant _____ not to be found in the jurisdiction of this court.

This 22 day of April, 2015.

S. B. [Signature] 2232

DEPUTY

SHERIFF DOCKET _____ PAGE _____

WHITE-CLERK CANARY-PLAINTIFF PINK-DEFENDANT

IN SUPERIOR COURT OF DEKALB COUNTY

STATE OF GEORGIA

Plaintiff

CLAUDIA BELINDA SANFORD

V.

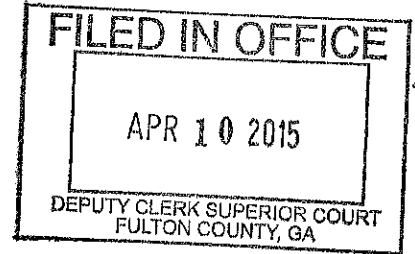
ALDRIDGE CONNERS, LLC

BANK OF AMERICA N.A SUCCESSOR BY MERGER TO

BAC HOME LOANS SERVICING, LP

FORMALY KNOW AS COUNTRYWIDE HOME LOANS, LP

Defendant



**EMERGENCY PETITION FOR TEMPORARY TRO AND EMERGENCY
INJUNCTION TO STOP FORECLOSURE**

**FOR WRONGFUL FORECLOSURE, DECLARATORY RELIEF AND
JUDGEMENT, FRAUD, ASSIGNMENT AND TITLE FRAUD/SLANDER
OF TITLE, VIOLATIONS OF FAIR DEBT COLLECTIONS ACT,
VIOLATION OF DUTY OF GOOD FAITH AND FAIR DEALING, CLAIM
FOR LITIGATION FEES AND COSTS**

Plaintiff, Claudia Belinda Sanford seeks an Emergency injunction to stop the defendants from foreclosure on said property at 631 WynPoint Place in Delkalb County Georgia. **Plaintiff** Claudia Belinda Sanford (Prose) brings this action against the above- named defendants for wrongful foreclosure, declaratory relief and judgment, fraud, assignment and title

fraud/slander of title fraud/slander of title, violations of fair debt collections act violations of duty good faith and fair dealings and claim for litigation fees and cost.

JURISDICTIONAL ALLEGATIONS

1. In this complaint; Plaintiff seeks an emergency injunction to stop foreclosure and eviction proceedings for themselves. Based on failure to comply with statutory basics to foreclosure. Plaintiff, seek to represent also seek a determination of validity of foreclosure sale in violation of statutory requirements, together with such other and further relief as the court may deem reasonable and just under circumstances.
2. Georgia has longstanding, statutorily prescribed Non-Judicial procedures by power of sale with minimal consumer protection for homeowners. O.C.G.A 44-14-162 et seq.
3. The law is clear, however, the entities foreclosing upon homeowners must abide by Georgia's statutory basics to foreclosure. O.C.G.A 23-2.114. Among other things, it is clear that the entity seeking to foreclose must have actual legal authority to use the power of sale.
4. At all times material to this lawsuit. Trent, Plaintiff was a resident of Gwinnett County Georgia.
5. At all times material to this lawsuit, Bank Of America, N.A Mortgage corporation is a located in 475Crosspoint Parkway Getzville, NY 14068
6. All acts necessary or precedent to bringing of this lawsuit occurred or accrued in Gwinnett County Georgia, ^{STONE MOUNTAIN} Lawrenceville.
DEKALB
7. This court has jurisdiction

GENERAL FACTUAL ALLEGATIONS

8. On July 23, 2004 Plaintiff and Defendant signed a note and Security Deed, in favor of Bank of America NA, for the purchasing of the subject property located at 631 WynPoint Place Stone Mountain, GA 30087 in Dekalb county GA.

9. Signed a promissory note in the amount of \$191,920.00

10. The said deed was recorded as: LAND LYING AND BEING IN LAND LOT 32 OF THE 18TH DISTRICT OF DEKALB COUNTY GEORGIA, BEING KNOWN AS LOT 15 OF SUDIVISION WYNBROOK CHASE AS SHOWN ON A PLAT RECORDED AT PLAT BOOK 130,PAGE 113-118, DEKALB COUNTY GEORGA IS RECORDS.

11. The loan number associated with the above referenced Deed is 65287569

12. At all times since the recordation of plaintiffs Deed, to the best of plaintiffs knowledge and believe, the loan had continually been with Bank Of America loan number 65287569 and Plaintiffs contact information remained the same

13. Defendant fails to identify Bank Of America N.A. Mortgage as the owner and holder of the note and fails to positively represent Bank Of America N.A that owns and holds any interest in the security Deed or has any rights which support a foreclosure of property.

14. Plaintiff is unsure whether Bank Of America N.A. or any other entity is the holder of the note as Bank Of America N.A failed to disclose the information requested through qualified written request.

15. Plaintiff received a notice of sale around on April 3rd, 2014

16. Defendants attempt to foreclose upon the subject property violates OCCGA 44-14-162 (b)

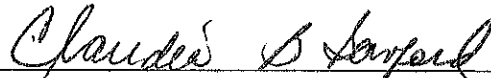
17. The date of sale is set for October 07, 2011 without intervention from court; plaintiff property will be illegally sold that day. A letter of confirmation was sent 9-29-2014 of CANCELATION OF FORECLOSURE SALE. No other Communication was issued.

18. Plaintiff alleges and restates the foregoing jurisdictional allegations and General factual allegations.

19. Plaintiff in the matter seeks relief for defendant's wrongful foreclosure practices and actions. Plaintiff seek declaratory and injunctive relief concerning foreclosures conducted by entities who do not hold the power of sale, injunction of eviction action pending procedures to verify the validity of original sales, injunction of upcoming sales where there is no proof of assignment ,cancellation of fees and cost for invalid sales processes and damages.

Wherefore, Plaintiff Request:

20. That all named Defendants Cease and Desist from any and all foreclosure proceedings pending each providing official verification of their standing as lender/mortgage note holder, servicer, agent, attorney, debt collector, investor ,trustee ,attorney in fact or otherwise in this matter.

A handwritten signature in cursive script, reading "Claudia B Sanford", is written over a horizontal line.

CLAUDIA BELINDA SANFORD

631 WynPoint Dr

Stone Mountain, GA 30087

ALDRIDGE CONNORS, LLP
15 Piedmont Center
3575 Piedmont Road, N.E.
Suite 500
Atlanta, GA 30305
Telephone: (404) 994-7400

9/29/2014

VIA REGULAR MAIL

1016-667500124A/Claudia Sanford
631 Wynpoint Place
Stone Mountain, GA 30087

RE: CANCELLATION OF FORECLOSURE SALE

Servicer's Loan Number:	65287569
Our File Number:	1016-667500124A
Original Borrower(s):	Claudia Sanford
Property Address:	631 Wynpoint Place, Stone Mountain, GA 30087

Dear Sir or Madam:

This letter will serve as confirmation that the foreclosure sale of the above-referenced property which was scheduled for **October 7, 2014** has been cancelled. If another foreclosure sale is scheduled for a later date, you will receive additional notice advising of the new sale date.

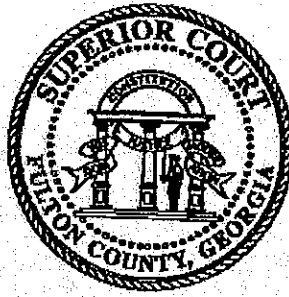
Sincerely,

Aldridge Connors, LLP

PLEASE BE ADVISED THAT THIS LETTER MAY CONSTITUTE AN ATTEMPT TO COLLECT A DEBT. ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE.

BANK of AMERICA N.A. MORTG
475 CROSS POINT PARKWAY
GETZVILLE, NY 14068

* ALDRIDGE CONNORS, LLP
15 PIEDMONT CENTER
3575 PIEDMONT ROAD, N.E
Atlanta, GA. 30305



IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA
136 PRYOR STREET, ROOM C-103, ATLANTA, GEORGIA 30303
SUMMONS

) Case
) No.:
)
CLAUDIA BELINDA SANFORD
)
 Plaintiff,
)
 vs.
)
ALDRIDGE CONNORS, LLC
)
BANK OF AMERICA
)
ACA COUNTRYWIDE HOME LOAN LP
)
 Defendant
)
)
)
)

TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file with the Clerk of said Court and serve upon plaintiff's attorney, whose name and address is:

ALDRIDGE CONNORS, LLP
15 PIEDMONT CENTER
3575 PIEDMONT ROAD NE
Atlanta GA 30305

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 10 day of April, 2015

Honorable Cathelene "Tina" Robinson
Clerk of Superior Court

By [Signature]
Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you _____ 20____

Deputy Sheriff

General Civil Case Filing Information Form (Non-Domestic)

Court

- ☐ Superior
☐ State

County Fulton

Date Filed

MM-DD-YYYY

Docket # 2015 CV2 59488

Plaintiff(s)

Sanford Claudia B
 Last First Middle I. Suffix Prefix Maiden

 Last First Middle I. Suffix Prefix Maiden

 Last First Middle I. Suffix Prefix Maiden

 Last First Middle I. Suffix Prefix Maiden

No. of Plaintiffs _____

Plaintiff/Petitioner's Attorney

☐ Pro Se

Sanford Claudia B
 Last First Middle I. Suffix

Bar # _____

Defendant(s)

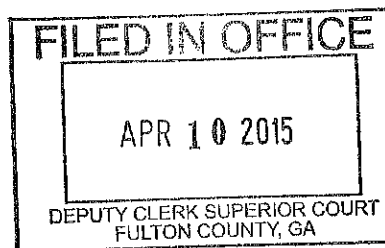
ALDRIDGE CONNERS, LLP
 Last First Middle I. Suffix Prefix Maiden

BANK of AMERICA NA SUCCESSOR BKA CANTLIDGE
 Last First Middle I. Suffix Prefix Maiden

 Last First Middle I. Suffix Prefix Maiden

 Last First Middle I. Suffix Prefix Maiden

No. of Defendants _____



Check Primary Type (Check only ONE)

- ☐ Contract/Account
☐ Wills/Estate
☐ Real Property
☐ Dispossession/Distress
☐ Personal Property
☐ Equity
☐ Habeas Corpus
☐ Appeals, Reviews
☐ Post Judgement Garnishment, Attachment, or Other Relief
☐ Non-Domestic Contempt
☐ Tort (If tort, fill in right column)
☒ Other General Civil Specify _____

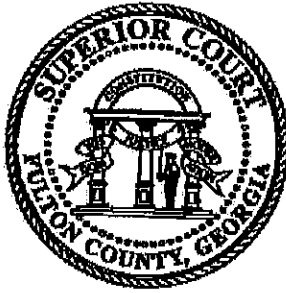
If Tort is Case Type:

(Check no more than TWO)

- ☐ Auto Accident
☐ Premises Liability
☐ Medical Malpractice
☐ Other Professional Negligence
☐ Product Liability
☐ Other Specify _____

Are Punitive Damages Pleaded? ☐ Yes ☐ No

- ☐ I hereby certify that the documents in this filing (including attachments and exhibits) satisfy the requirements for redaction of personal or confidential information in O.C.G.A. 9-11-7.1



IN THE SUPERIOR COURT OF FULTON COUNTY, GEORGIA
136 PRYOR STREET, ROOM C-103, ATLANTA, GEORGIA 30303
SUMMONS

CLAUDIA BELINDA SANFORD
Plaintiff,
vs.
ALDRIDGE CONNERS, LLP
BANK OF AMERICA
A COUNTRYWIDE HOME LP
Defendant


TO THE ABOVE NAMED DEFENDANT(S):

You are hereby summoned and required to file with the Clerk of said Court and serve upon plaintiff's attorney, whose name and address is:

BANK of AMERICA NA MORTG
475 CROSS POINT PARKWAY
GETZVILLE, NY 14068

An answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service; unless proof of service of this complaint is not filed within five (5) business days of such service. Then time to answer shall not commence until such proof of service has been filed. **IF YOU FAIL TO DO SO, JUDGMENT BY DEFAULT WILL BE TAKEN AGAINST YOU FOR THE RELIEF DEMANDED IN THE COMPLAINT.**

This 10 day of April, 2015

Honorable Cathelene "Tina" Robinson
Clerk of Superior Court
By 
Deputy Clerk

To defendant upon whom this petition is served:

This copy of complaint and summons was served upon you _____, 20____

Deputy Sheriff